

SUPREME COURT  
OF THE STATE OF WASHINGTON RECEIVED BY E-MAIL *b/h*

GEORGIANA ARNOLD,

Respondent,

v.

CITY OF SEATTLE, d/b/a HUMAN  
SERVICES DEPARTMENT,

Petitioner.

No. 91742-6

STATEMENT OF  
ADDITIONAL  
AUTHORITIES

COMES NOW respondent Georgiana Arnold, and submits the following additional authorities to the Court pursuant to RAP 10.8:

- *Hayes v. Trulock*, 51 Wn. App. 795, 755 P.2d 830, review denied, 111 Wn.2d 1015 (1988) (RCW 49.48.030 applied to tortious wrongful termination claim);
- *Fraser v. Edmonds Community College*, 136 Wn. App. 51, 147 P.3d 631 (2006) (RCW 49.48.030 applies to other than action to collect wages; employee recovered against employer for failure to rehire post-retirement on basis of promissory estoppel);
- *Corey v. Pierce County*, 154 Wn. App. 752, 225 P.3d 367, review denied, 170 Wn.2d 1016 (2010) (RCW 49.48.030 applied to contract created by promissory estoppel);
- *McIntyre v. State*, 135 Wn. App. 594, 605, 141 P.3d 75 (2006) (contention that RCW 49.48.030 did not apply to disciplinary proceeding because such a proceeding was not an "action" was "frivolous;" court stated: "It cannot be denied that the recovery of salary owed is intimately tied to the reinstatement from wrongful termination.");

Statement of Additional Authorities

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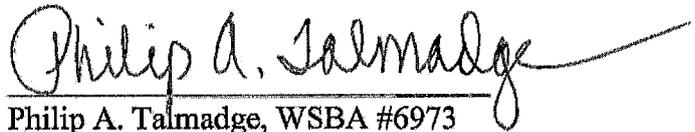


ORIGINAL

- *Pasco Police Officers' Ass'n v. City of Pasco*, 132 Wn.2d 450, 462, 938 P.2d 827 (1997) (before a party to a collective bargaining agreement is said to have waived a statutory right like fees under RCW 49.48.030, waiver must be "clear, unmistakable, and knowingly made.");
- *State v. Wright*, 84 Wn.2d 645, 529 P.2d 453 (1974) (doctrine of reading statutes in pari materia not confined to statutes enacted in same year, but applies to entire sequence of statutes relating a given subject matter; Court applied principle to sequence of statutes enacted in 1901, 1935, 1951, 1961, 1963, and 1967 relating to ocean beaches);
- *Lawson v. City of Pasco*, 144 Wn.2d 203, 209, 181 P.3d 896 (2008) (pre-emption not confined to express preemption; field and conflict preemption also possible).

DATED this 6th day of January, 2016.

Respectfully submitted,



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DECLARATION OF SERVICE

On said day below I emailed a copy for service a true and accurate copy of the Statement of Additional Authorities in Supreme Court Cause No. 91742-6 to the following:

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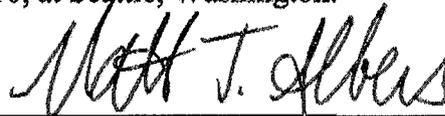
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I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct.

DATED: January 6, 2016, at Seattle, Washington.



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Matt J. Albers, Paralegal  
Talmadge/Fitzpatrick/Tribe

## OFFICE RECEPTIONIST, CLERK

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**Subject:** RE: Georgiana Arnold v. City of Seattle - Supreme Ct Cause #91742-6

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Supreme Court Clerk's Office

Please note that any pleading filed as an attachment to e-mail will be treated as the original. Therefore, if a filing is by e-mail attachment, it is not necessary to mail to the court the original of the document.

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**Subject:** Georgiana Arnold v. City of Seattle - Supreme Ct Cause #91742-6

Good morning:

Attached please find the following document for filing with the Supreme Court:

Document to be filed: Arnold's Statement of Additional Authorities  
Case Name: Georgiana Arnold v. City of Seattle d/b/a Human Services Department  
Case Cause Number: 91742-6  
Attorney Name and WSBA#: Philip A. Talmadge, WSBA #6973  
Contact information: Matt J. Albers, (206) 574-6661, [matt@tal-fitzlaw.com](mailto:matt@tal-fitzlaw.com)

Please let me know if you have any questions. Thank you.

Very truly yours,

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